

1
2
3
4
5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 ESTATE OF MILDRED HOSKINS, et al.,
9 Plaintiffs,
10 v.
11 WELLS FARGO BANK N.A., et al.,
12 Defendants.

Case No. 2:20-cv-00075 RSM

STIPULATION TO EXTEND
DEADLINE FOR SUBMISSION OF
COMBINED JOINT STATUS REPORT
AND DISCOVERY PLAN, AND
ORDER

13 Plaintiffs and Defendants jointly stipulate that the deadline for submission of the
14 combined joint status report and discovery plan shall be extended as follows. Upon the
15 issuance of the Court's decision on both of the pending motions to dismiss, all parties shall
16 have 20 days within which to file the combined joint status report and discovery plan.

17 The previous deadline for this report was March 4th 2020. However, due to the
18 pending motions to dismiss any combined statement may become unnecessary or inaccurate
19 based upon the Court's decision. Therefore, it seems prudent to the parties to extend the
20 deadline until after the Court makes a decision upon the outstanding motions. The parties
21 therefore respectfully request that the Court for good cause shown enter an order granting this
22 extension. No other case deadlines will be affected by this extension.

23 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

24 DATED March 6, 2020.
25
26

1 HARPER LAW OFFICES, INC., P.S.

K&L GATES LLP

2 By: /s/ Joseph T.G. Harper

By: /s/ Peter A. Talevich

3 Joseph T.G. Harper, WSBA #34297
4 Charles V. Barnett, WSBA # 54588

Peter A. Talevich, WSBA # 42644
Christopher A. Vandervoort, WSBA #52582
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Phone: (206) 623-7580
Fax: (206) 623-7022
E-mail: peter.talevich@klgates.com
E-mail: christopher.vandervoort@klgates.com

5 8310 S. Park Avenue
Tacoma, WA 98408
6 Phone: (253) 212-2450
E-mail : harperlawoffices@comcast.net
7 E-mail : charles@hlolegal.com

8 Attorneys for Plaintiffs Estate of Mildred
Hoskins; Andre Hoskins and Eric Hoskins,
9 Co-Personal Representatives and Individually;
Christopher Hoskins; Estelita Hoskins

Attorneys for Defendant Wells Fargo Bank,
N.A.

10
11 MALCOM & CISNEROS, A Law
Corporation

12 /s/ Nathan F. Smith

13 Nathan F. Smith, WSBA #43160
14 2112 Business Center Drive
Irvine, CA 92612
15 Phone: (949) 252-9400
Fax: (949) 252-1032
16 Email: nathan@mclaw.org

17 Attorneys for Defendant Nationstar Mortgage,
LLC d.b.a. Champion Mortgage

18
19 PURSUANT TO STIPULATION, IT IS SO ORDERED this 6th day of March 2020.

20
21 

22 RICARDO S. MARTINEZ
23 CHIEF UNITED STATES DISTRICT JUDGE
24
25
26

1 Presented by:

2 HARPER LAW OFFICES, INC., P.S.

K&L GATES LLP

3
4 By: /s/ Joseph T.G. Harper

By: /s/ Peter A. Talevich

5 Joseph T.G. Harper, WSBA #34297
Charles V. Barnett, WSBA # 54588

Peter A. Talevich, WSBA # 42644
Christopher A. Vandervoort, WSBA #52582
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Phone: (206) 623-7580
Fax: (206) 623-7022
E-mail: peter.talevich@klgates.com
E-mail: christopher.vandervoort@klgates.com

6 8310 S. Park Avenue
7 Tacoma, WA 98408
Phone: (253) 212-2450
8 E-mail : harperlawoffices@comcast.net
E-mail : charles@hlolegal.com

9 Attorneys for Plaintiffs Estate of Mildred
10 Hoskins; Andre Hoskins and Eric Hoskins,
Co-Personal Representatives and Individually;
11 Christopher Hoskins; Estelita Hoskins

Attorneys for Defendant Wells Fargo Bank,
N.A.

12 MALCOM & CISNEROS, A Law Corporation

13 /s/ Nathan F. Smith

14 Nathan F. Smith, WSBA #43160
15 2112 Business Center Drive
Irvine, CA 92612
16 Phone: (949) 252-9400
Fax: (949) 252-1032
17 Email: nathan@mclaw.org